

**Department of Administration
State of Alaska
Single Audit – Compliance Supplement**

Program #	Program Name	Last Revised
1	Home and Community-Based Care Services Program	5/00
2	Nutrition, Transportation, and Support Services Program	5/00
3	Senior Community Service Employment Program	7/01
4	Senior Residential Services Program	5/00
5	Alaska Public Broadcasting Commission Grants	1/86
6	Municipal Grant Program -Transferred to the Department of Community & Economic Development 7/1/99-See program #23	See DCED #23

Home and Community-Based Care Services Program

Department of Administration – Program 1

I. PROGRAM OBJECTIVES

The Alaska Legislature created the Alaska Commission on Aging (ACoA) in 1981 to ensure dignity and independence for Alaska's elderly, and assist them in maintaining meaningful, quality lives. As part of the Division of Senior Services, the ACoA plans, coordinates, and grants funds to provide community-based services to help seniors live as independently as possible. Services include meals, rides, residential care, adult day programs, respite care, care coordination, support to families of dementia clients, legal services, and a variety of other support services. The Division of Senior Services is the State Unit on Aging for the Older Americans Act. Alaska is a single planning and service area state.

A. Accounts Structure.

ACoA administration is in the Division's Protection, Community Services, and Administration budget component. ACoA oversees four grants programs, in four other Division budget components:

- The Home and Community-Based Care (HCB) budget component includes grant funds supporting adult day services, respite care, care coordination, and Alzheimer's Disease education and family support. Funding sources include state general funds authorized under AS 47.65 and state general funds allocated from the Alaska Mental Health Trust.
- The Senior Residential Services (SRS) budget component includes grant funds supporting senior residential services. Funding sources include designated grant funds authorized under AS 47.65.
- The Nutrition, Transportation and Support Services (NTS) budget component includes grant funds supporting senior nutrition, transportation, and supportive services. Funding sources include federal Title III B, C, D, and F of the Older Americans Act, U.S. Department of Agriculture cash reimbursement, required state general fund match, and state general funds authorized under AS 47.65.
- The Senior Community Services Employment Program (SCSEP) budget component includes grant funds supporting the senior employment programs. Funding sources include federal Title V, required state general fund match, and state general funds authorized under AS 47.65.

B. Program Organization

ACoA grants separate awards for HCB, SRS, NTS, and SCSEP services. HCB grant awards for adult day services, respite care services, care coordination, and support for families of dementia clients require grantees to implement sliding fee schedules and when possible, bill third party insurance and other third party payer services. SRS grant awards for senior residential services allow grantees to charge fees for services. In contrast, federal regulations govern NTS grants for meals, rides, and a variety of support services through Title III of the Older Americans Act, and prohibit the assessment of client fees, though allow for the solicitation of voluntary client contributions. The SCSEP is separate because it is a jobs program, rather than a services program such as NTS, HCB, and SRS--although SCSEP participants often fill staff positions in the services programs. Separate HCB and SRS grant awards also assure that Alaska Mental Health Trust Authority (MHTA) funds are allocated and tracked. In addition, HCB and SRS services are ACoA's more intensive, higher cost-per-client services.

II. PROGRAM PROCEDURES

See Section III, below.

III. COMPLIANCE REQUIREMENTS AND SUGGESTED AUDIT PROCEDURES

A. TYPES OF SERVICES ALLOWED OR UNALLOWED

Compliance Requirements

The ACoA-funded services provide more intensive personal care directed to clients at risk of institutionalization. ACoA funds these services with a blend of state general funds and state general funds from the MHTA.

Home and Community Based service programs include the following:

- 1) Adult Day centers provide planned and supervised day-time activities for physically frail or disabled seniors age 60 and over and adults of any age with Alzheimer's Disease and Related Disorders (ADRD). When staffing and space allows, adult day care centers may serve full pay non-ADRD clients under 60 years of age.
- 2) Adult Respite Care programs provide in-home respite care by trained care providers to physically frail seniors 60 and over and adults of any age with ADRD. In addition to ACoA grant awards, the MHTA provides funding (MHTAAR) for innovative respite grants to four respite programs. These monies provide funds for additional hours of care to persons with ADRD, above what the base ACoA funding grant allows. The MHTA funds also permit a 'universal provider' model of service delivery in which one worker rather than separate workers may provide services such as respite, chore, and when qualified, personal care services.

- 3) Care Coordination programs (formerly called case management) conduct comprehensive client assessments, service coordination, and ongoing monitoring of service delivery for physically frail or disabled seniors age 60 and over, adults of any age with ADRD, and General Relief clients of any age. Additional state general and mental health monies fund the care coordination program in Fairbanks to provide "brokered" services to ADRD clients under a co-payment discounted system.
- 4) The Alzheimer's Education and Outreach grant is a sole source grant to provide information on Alzheimer's disease and related disorders, community and professional education, and family support services for the families dealing with ADRD statewide.

Funds for HCB grants must be spent only to support the above services. The specific grant identifies the services to be provided and any exceptions must be approved by the ACoA through special grant conditions or Approved Concept Approval Request. Grantees that receive funds for more than one service will receive a separate Notice of Grant Award (NGA) for each type of service.

The following ACoA grants management policies have been in effect since FY 93:

- Grants are awarded based on approved "bottom-line" budgets. Grantees no longer have line item accountability to ACoA within their HCB budgets;
- ACoA may adjust allotments of HCB grants (within the total amount of the grant) based on ACoA's budget control and each grantee's units of service to AMHT-eligible clients. Adjusted allotments will be reflected in revised NGA's to affected grantees.
- Grantees must submit a "Concept Approval Request" form if they wish to change their projects in some way that will cause service levels to increase or decrease more than 5% from the planned service levels shown on their Planned Services form or make any other *very major change* from what was submitted in the grant application. Examples of "very major changes" include adding or discontinuing a service, opening or closing a site; changing days of service; changing hours of service; serving more or fewer months of the year; shifting large amounts into travel for more than one trip out of state; or a large purchase of equipment.

Suggested Audit Procedures

- Review specific Request for Proposals under which the grant is funded;
- Review the grant application, Special Conditions of Award on the final Notice of Grant Award, and any approved Concept Approval Requests to determine the approved service activities. Occasionally, letters or memoranda in the file may document approved changes in grant activities;

- Determine whether accounting records provide for identification, classification and recording of expenditures and revenues for each allotment on the Notice of Grant Award and for each separate service funded; and
- Verify that expenditures were in accordance with grant terms and conditions and were for allowable costs.

B. ELIGIBILITY

Compliance Requirement

All Home and Community-Based Care programs provide services to physically frail or disabled seniors age 60 and over and adults of any age with Alzheimer's Disease and Related Disorders (ADRD). Within this population, the ACoA expects grantees to concentrate their efforts to serve ethnic minority and low-income seniors.

Order of priority for services is directed to clients:

- Living at home, with or without primary caregivers,
- Living in a supported living environment such as independent senior housing or with relatives;
- Receiving 24-hour care in an adult assisted living home.

Care to clients in a 24-hour formal care facility other than adult assisted living care is not a priority for funding under these grant programs.

Some specific eligibility requirements for specific programs are listed below. Refer to the specific Request for Proposals (RFP), however, for full range of eligibility requirements.

- 1) Adult day centers provide service to clients in need of assistance with Activities of Daily Living (ADL) such as bathing, eating, dressing, toiletry, bed/chair transfer, walking; and Instrumental Activities of Daily Living (IADL) such as housekeeping, meal preparation, shopping, and transportation. In addition, adult day programs may serve non-ADRD clients under 60 if there is room in the program, if they are appropriate to the day care setting, and if they pay full cost of care for the service.
- 2) Adult in-home respite care programs provide relief to caregivers by providing care to physically frail or disabled seniors over 60 years of age and people of any age with ADRD so as to allow caregivers time for themselves. As such, the clients that receive care must have an identified caregiver, usually someone living in the household. Under special circumstances, care may be provided to a senior who lives alone but who has a designated caregiver nearby.

- 3) Care Coordination serves at risk seniors 60 years of age and over with multiple needs, as well as adults of any age with Alzheimer's disease, and adults on general relief (see RFP for other eligibility criteria.)
- 4) ADRD Statewide Support has no defined clientele but serves as an information, family support and community education program about Alzheimer's disease.

Suggested Audit Procedures

- Test participant eligibility, if applicable.

C. MATCHING, LEVEL OF EFFORT, AND/OR EARMARKING REQUIREMENTS

Compliance Requirements

All HCB programs must provide required match as described in the RFP. Local match must be comprised of cash or in-kind items necessary to provide the services of the grant. In-kind match items must be items for which ACoA grant dollars could be used if they were available. In HCB programs, program income and client fees for service may be used to meet match. For a complete discussion of local match, refer to the Cost Proposal Instructions in the RFP under which the grant is funded.

The required local match percentage varies for each community or group of communities from year to year. The amount of local match required is specified on the final Notice of Grant Award.

Suggested Audit Procedures

- Review final notice of Grant Award to identify the required level of local match;
- Review grant application and any approved Concept Approval Requests to identify the approved sources of local match; and
- Review the agency's accounting records to determine whether local match has been contributed to the project according to the terms and conditions of the grant.

D. REPORTING REQUIREMENTS

Compliance Requirements - Program Reports

Quarterly Program Reports are due in the Alaska Commission on Aging Juneau office by the 25th of the month following the end of the quarter. Provisions for late reports are discussed in the instructions for the report.

Reports are to show all of the required information for each service provided or client group served under the grant.

Suggested Audit Procedures

- Review the HCB Quarterly Program Report Instructions for the grant year being audited;
- Evaluate the timeliness of report submission;
- Evaluate the completeness of the reports based on approved grant service activities; and
- Evaluate the accuracy of the reports by tracing and linking data on the reports to supporting documentation.

Compliance Requirements - Fiscal Reports

Cumulative Fiscal Reports are due in the Alaska Commission on Aging Juneau office by the 25th of the month following each quarter. If the fourth quarter's report is not marked "Final," a final Cumulative Fiscal Report is due in the ACoA Juneau office by July 30. Provisions for late reports are discussed in the instructions for the report. Reports are to accurately reflect the financial transactions of the grant as specified in the instructions for the report.

Suggested Audit Procedures

- Review the most recent Cumulative Fiscal Report Instructions for the program;
- Evaluate the timeliness of report submission;
- Evaluate the completeness of the reports based on approved grant service activities; and
- Evaluate the accuracy of the reports by tracing and linking data on the reports to supporting documentation.

E. SPECIAL TESTS AND PROVISIONS

- 1) Fees for Service. The Adult Day Centers, Respite Care, and Care Coordination programs must establish fees for services based on the actual cost of service as required by State regulation. Clients may receive discounted rates, based on income, family size, or other variable specified on a sliding fee scale. No client will be turned down because of an inability or unwillingness to pay fees. Fees received from clients do not have to be expended during the quarter in which they were received but requests to carry over these fees into the next fiscal year must be approved by ACoA.
- 2) Program Income. All HCB programs may solicit program income from clients; however, fees for services may usurp program income from clients. Programs must account for program income from clients and spend those funds to enhance or expand the program from which it was derived.

Program income is to be spent in the grant year in which it was received. Requests to carry over program income into the next fiscal year must be approved by ACoA. Program income must be expended before ACoA grant funds, unless ACoA has specifically approved other arrangements.

- 3) Program Income Not From Clients. All HCB programs potentially will receive and report interest on bank accounts, rent from the grant portion of the building space, or other sources of program income not from clients.
- 4) Other Sources. Medicaid Waiver receipts used to support the grant should be classified as “Other Sources.”
- 5) Criminal Background Checks of In-Home Employees. Each employee of an agency providing publicly funded home care services (homemaker, chore, personal care, home health, and similar services), including volunteer staff and Senior Employment Program participants who provide these services, must have a criminal background check done by the Department of Public Safety, pursuant to AS 12.62.035. Each grantee must adhere to this statute and pursuant regulations.

Suggested Audit Procedures

- Check that adult day centers, respite care, and care coordination programs have established a cost for service and are billing clients and collecting fees for services based on a sliding fee schedule;
- Review the grant application (and Notice of Grant Award for possible modifications) to determine the source of program income and whether it was to be solicited from clients;
- Evaluate the solicitation, collection, handling, accounting for, and use of program income;
- Review documentation of receipt and expenditure of Medicaid Waiver revenue to determine whether it is classified as “Other Sources” when dedicated to HCB grant services; and
- Review records to verify that each employee performing home care services has had a criminal background check and has no record of criminal behavior relating to children or senior citizens.

Modified 5/00

Nutrition, Transportation, and Support Service Program

Department of Administration – Program 2

I. PROGRAM OBJECTIVES

The Alaska Legislature created the Alaska Commission on Aging (ACoA) in 1981 to ensure dignity and independence for Alaska's elderly and assist them in maintaining meaningful, quality lives. As part of the Division of Senior Services, the ACoA plans, coordinates, and grants funds to provide community-based services to help seniors live as independently as possible. Services include meals, rides, residential care, adult day programs, respite care, care coordination, support to families of dementia clients, legal services, and a variety of other support services. The Division of Senior Services is the State Unit on Aging for the Older Americans Act. Alaska is a single planning and service area state.

A. Accounts Structure.

ACoA administration is in the Division's Protection, Community Services, and Administration budget component. The ACoA oversees four grant programs in four additional budget components:

- The Home and Community-Based Care (HCB) budget component includes grant funds supporting adult day services respite care, care coordination, and Alzheimer's Disease education and family support. Funding sources include state general funds authorized under AS 47.65 and state general funds allocated from the Alaska Mental Health Trust Authority.
- The Senior Residential Services (SRS) budget component includes grant funds supporting senior residential services. Funding sources include designated state general funds authorized under AS 47.65.
- The Nutrition, Transportation and Support Services (NTS) budget component includes grant funds supporting senior nutrition, transportation, and supportive services. Funding sources include federal Title III B, C, D, and F of the Older Americans Act, U.S. Department of Agriculture cash reimbursement, required state general fund match, and state general funds authorized under AS 47.65.
- The Senior Community Service Employment Program (SCSEP) budget component includes grant funds supporting the senior employment programs. Funding sources include federal Title V,

required state general fund match, and state general funds authorized under AS 47.65.

B. Program Organization

The ACoA grants separate awards for HCB, SRS, NTS, and SCSEP services. HCB grant awards for adult day services, respite care services, care coordination, and support for families of dementia clients require grantees to implement sliding fee schedules and when possible, bill third party insurance and other third party payer sources. SRS grant awards for senior residential services allow grantees to charge fees for services. In contrast, federal regulations govern NTS grants for meals, rides, and a variety of support services through Title III of the Older Americans Act, and prohibit the assessment of client fees, though allow for the solicitation of voluntary client contributions. The SCSEP is separate because it is a jobs program, rather than a service program such as NTS, HCB, and SRS--although SCSEP participants often fill staff positions in the services programs. Separate HCB and SRS grant awards also assure that Alaska Mental Health Trust Authority (MHTA) funds are allocated and tracked. In addition, HCB and SRS services are ACoA's more intensive, higher cost-per-client services.

II. PROGRAM PROCEDURES

See Section III, below.

III. COMPLIANCE REQUIREMENTS AND SUGGESTED AUDIT PROCEDURES

The Nutrition, Transportation and Support Services grants are funded with a blend of Older Americans Act Titles III B, C, D, and F, USDA funds, and state general funds. Title III D and F funds are included in only a few grants. The blend may change during the course of the funding period. Grantees are advised of their final breakdown of federal funds by funding source after the State closeout, usually in the fall. Because the final blend of federal and state funds cannot be determined until after the end of the funding period, ACoA requires grantees to follow federal cost principles for all their NTS funds.

A. TYPES OF SERVICES ALLOWED OR UNALLOWED

For FY00/FY01 grant cycle, the service classifications for the Nutrition, Transportation, and Support Services program are as follows:

1. Congregate Meals
2. Home-Delivered Meals
3. Transportation;
4. Assisted Rides
5. Unassisted Rides
6. Support Services

7. Outreach
8. Information and Assistance
9. Statewide Legal Services
10. Statewide Media
11. Volunteer Services (Foster Grandparents & RSVP only)
12. In-Home Services
13. Homemaker (includes shopping and escort that does not involve transportation)
14. Chore
15. Volunteer Services (Senior Companion only)
16. Preventive Health Services (per Work Plan)

Nearly all grantees are required to provide Outreach to locate individual, hard-to-reach prospective clients. For each grantee required to provide Outreach, Outreach is listed as a funded service on the final Notice of Grant Award and the grantee must commit resources to it in the grant budget and reporting. This required NTS Outreach may be done without the use of NTS grant dollars, in which case other resources must be designated, for this function in the NTS budget and reporting. A grantee be relieved from providing Outreach for a given grant period via a letter from ACoA.

ACoA periodically awards Title III funds as “mini-grants” to existing ACoA grantees and their organizations that meet eligibility requirements (non-profit, local government, or tribal entities). Mini-grant awards are for one-time projects that support NTS programs or services. Typically, mini-grants fund activities such as life, health or safety improvements of program facilities, needed equipment, disaster planning, transportation services, expansion of services, or training, planning and assessments.

Training funds may be awarded as separate grants or as part of the regular NTS grants. (identified on the Notice of Grant Award). The purpose of training is to improve services to senior citizens by expanding staff and volunteer knowledge about aging issues, programming and management.

Grant funds must be expended for services specifically identified in the grant application, or in an approved modification. In the case of modification or special stipulations on grant awards, the Notice of Grant Award will state the “special conditions.”

Approved services are specified on the Notice of Grant Award. Expenditures for each specific service must be charged to both the appropriate line item and allotment. All funds must be accounted for separately and by allotment. Grantees are allowed some flexibility in line item expenditures.

Beginning with FY 93:

- Grants are awarded based on approved “bottom-line” budgets. Grantees no longer have line item accountability within their budgets.
- ACoA will adjust allotments at the end of the year, as long as allotment over expenditures are offset by under-expenditures in another allotment. ACoA will make the final changes based on the grantee's final Cumulative Fiscal Report and issue a revised Notice of Grant Award which shows the final approved budget.
- Grantees must submit a “Concept Approval Request” form if they propose:
 - 1) to increase or decrease by 5% or more the planned service levels shown on the grant’s Planned Services form.
 - 2) major changes are requested to the approved grant, such as, adding or removing service(s), opening or closing a site; adding, decreasing or changing days of service; changing hours of service; serving more or fewer months of the year; purchase of equipment; etc.

Suggested Audit Procedures

- Review specific Request for Proposals under which the grant is funded, especially for service definitions.
- Review the grant application, Special Conditions of Award on the Notice of Grant Award, and any approved Concept Approval Requests to determine the approved service activities. Occasionally, letters or memoranda in the file may document approved changes in grant activities. Final approved services are on the final Notice of Grant Award.
- Determine whether accounting records provide for identification, classification and recording of expenditures and revenues for each allotment on the final Notice of Grant Award and for each separate service or group of services funded by that allotment.
- Verify that expenditures were in accordance with the applicable RFP, the grant terms and conditions, and any written directives from ACoA, applicable federal rules and cost principles for the period in question, and generally accepted accounting principles.

Suggested Audit Procedures for Separate Training and/or Planning Grants

- Review training and/or planning RFP (if applicable), grant application or letter of request, and final Notice of Grant Award for Special

Conditions of Award. Letters or memos in the file may document reasons for approved changes to grant activities.

- Look for completion of approved training and/or planning by the end of the grant period and submission of a final reimbursement report.
- Evaluate the accuracy of the reimbursement report (or Cumulative Fiscal Report for planning) by tracing and linking data to supporting documentation.

B. ELIGIBILITY

Compliance Requirements

All persons 60 years of age or over are eligible for Nutrition, Transportation, and Support Services. There are no income or residency requirements. In addition, spouses of persons 60 years of age or older or disabled persons who live with 60+ persons and accompany them to the meals are eligible to receive congregate meals, including transportation to and from them. Also, meal time volunteers and disabled persons under 60 who reside in housing facilities occupied primarily by the elderly at which congregate meal services are provided are eligible for 60+ meal service. Home-delivered meals are available only to persons who are either temporarily or permanently homebound by reason of illness or incapacitating disability or are otherwise isolated. The spouse or caregiver of a 60+ homebound individual is also eligible for a home-delivered meal if it is in the best interest of the 60+ homebound individual that a meal be provided to the other party. Beginning in FY 97, home-delivered meals providers are required to have written criteria for home-delivered meal eligibility and document the eligibility of each person who receives home-delivered meals. Any ineligible person must pay the full cost of any NTS service received.

Suggested Audit Procedures

- Test participant eligibility.
- Review criteria for determining who receives home-delivered meals and test participant eligibility.
- Review procedures for the advertisement, collection, and recording of payments from ineligible persons (guests).

C. MATCHING, LEVEL OF EFFORT, AND/OR EARMARKING REQUIREMENTS

Compliance Requirements

Local match must be comprised of cash or in-kind items necessary to provide the services of the grant. In-kind match items must be items for which ACoA grant dollars could be used if they were available. Program Income cannot be used to meet match. (For a complete discussion of local match, refer to the Cost Proposal instructions in the applicable NTS RFP and to the NTS

Cumulative Fiscal Report Instructions for the applicable year.) The required local match percentage varies for each community or group of communities from year to year. The amount of local match required is specified on the final Notice of Grant Award.

Separate NTS training and/or planning grants require match only if indicated on the Notice of Grant Award.

Suggested Audit Procedures

- Review discussion of local match in the grant application Cost Proposal Instructions and final Notice of Grant Award, to identify the approved amount and sources of local match.
- Review the agency's accounting records to determine whether local match has been contributed to the project according to the terms and conditions of the grant and as reported to ACoA.

D. REPORTING REQUIREMENTS

Compliance Requirements

Quarterly Program Activity Reports and quarterly Cumulative Fiscal Reports are due in the Alaska Commission on Aging Juneau office by the 15th of the month following the end of the quarter. Provisions for late reports are discussed in the instructions for the reports. Reports must show all of the required information for each service provided or client group served under the grant.

For separate “mini” or training grants: The requirement for program reports for one-time or training grants will be stated in the Request for Proposal, and the Notice of Grant Award. Some training grants are not required to submit reports unless specified on the Notice of Grant Award. Expenditures of “mini” or training grant funds are reported separately from other ACoA awards and grant activities. Programs that are recipients of “mini” or training grants submit reimbursement requests to ACoA after completion of the training.

Suggested Audit Procedures

- Review the Nutrition, Transportation, and Support Services Quarterly Program Report Instructions and Cumulative Fiscal Report Instructions for the grant year being audited.
- Evaluate the timeliness of report submission, per report instructions.
- Evaluate the accuracy of the reports by tracing and linking data on the reports to supporting documentation.

Suggested Audit Procedures for Training

- Evaluate timeliness of training.

- Evaluate the accuracy of the training reimbursement report by tracing and linking data on the reimbursement form to supporting documentation.

Compliance Requirements

Monthly Meal Count Reports which accurately reflect the number of congregate and home-delivered meals served to eligible clients are required for each grant which provides congregate or home-delivered meals. These are due in the ACoA Juneau office on the 15th of the month (the next business day when the 15th falls on a weekend or State holiday) following the month which is the subject of the report.

Suggested Audit Procedures

- Evaluate the timeliness of report submission.
- Evaluate the accuracy of the report by tracing and linking the data on the reports to supporting documentation.

E. SPECIAL TESTS AND PROVISIONS

General “Program Income” Compliance Requirement

All Program Income (whether it is Program Income from Clients or Program Income Not From Clients) must be spent first before ACoA grant funds. Program Income must also be spent in the quarter in which it is collected, and spent on the service(s) that generated the income. (Unless ACoA has specifically approved other arrangements.)

Suggested Audit Procedures

- Review the pages of the Cost Proposal Instructions in the applicable Nutrition, Transportation, and Support Services RFP, which explain what constitutes each type of Program Income.
- Review records to ascertain that Program Income is being used right away after it is collected and is not being held by the grantee for later use unless the grantee has specific written permission from ACoA to hold it.

“Program Income From Clients” Compliance Requirements

By federal regulation, clients of ACoA's Nutrition, Transportation, and Support Services program must be given the opportunity to make confidential, free-will contributions to support at least meal and transportation services they receive through the program. Each service provider must encourage, safeguard, and account for this “Program Income from Clients.” Each contribution must be used to support the specific service for which it is collected.

Suggested Audit Procedures

- Review the following for a complete understanding of Program Income From Clients requirements:

- NTS Cumulative Fiscal Report Instructions for the year being audited, Client Contributions section
- The Cost Proposal Instructions in the RFP under which the grant is funded, Program Income from Clients section.
- Evaluate the solicitation, collection, and handling, accounting for, and use of client contributions for compliance with RFP and grant application requirements. Make sure contributions are solicited and are tracked separately for meals and transportation.

Medicaid Waiver Receipts Compliance Requirements

Medicaid Waiver receipts used to support the grant should be classified as “Other Sources.”

Suggested Audit Procedure

- Check to see if Medicaid Waiver receipts are properly classified.

“USDA” Compliance Requirements

USDA refers to United States Department of Agriculture cash payments. USDA reimbursement is available to all ACoA meal projects.

USDA cash must be used to buy food, either as food supplies or through food service contracts. It cannot be used to support any other costs.

USDA is a reimbursement program. Reimbursements are based on the actual number of meals served to eligible individuals and the rate may be different from one Federal Fiscal Year to the next.

ACoA NTS grantees that supply meals to Adult Day Care Programs may also be enrolled in a separate Department of Education & Early Development USDA program. Enrolled programs count ADC meals under ACoA NTS monthly reporting requirements, as a meal prepared with ACoA funds, but not for ACOA USDA reimbursement. Enrolled adult day care programs receive higher USDA reimbursement through the Department of Education & Early Development Day Care program.

Suggested Audit Procedures

- Review grants records to ascertain whether USDA cash payments were spent on food or food service contracts for NTS project meals.
- Review grant records to verify that the number of meals served is accurately represented on the Monthly Meal Count Reports. If meals to eligible individuals were over reported, indicate the difference between the correct number and the number reported. (If meals to eligible individuals

were underreported, the grantee will not receive any additional USDA reimbursement.) Identify the amount of any USDA overpayment.

- Review records for ADC meals to make sure they do not receive both ACoA and DEED USDA reimbursement.
- Verify the USDA amount is accrued on each Cumulative Fiscal Report, even if the agency is on a cash accounting system. (All final Cumulative Fiscal Reports must show all costs and revenues on an accrual basis.)

“Fundraising” and Other Non-grant Activities

Compliance Requirements

Fundraising is an unallowable cost under applicable federal cost principles. ACoA does not consider grant writing to be a fundraising activity.

As government grant resources have been reduced in recent years, grantees have needed to come up with increased non-government resources to meet their costs. Fundraising has become a major activity of most Nutrition, Transportation, and Support Services grantees.

Although fundraising is a grantee board function, occasionally grantee boards, especially among nonprofit corporations, expect ACoA grant project directors and other grant staff to be actively involved in fundraising. ACoA grant staff are paid by the grant to provide services. The time they spend on organized fundraising cannot legally be charged to the grant.

However, it is permissible for the grantee to split a position into two or more parts to allow that position to do fundraising part of the time. For example, a grantee may assign 90% of a particular position's time to provide grant services and 10% of that same position's time to do fundraising on behalf of the board. In this example then, the grantee should show 90% of that position's cost in the grant and 10% of it outside the grant (to be paid for with fund raising dollars or other grantee agency dollars).

In most cases, simply shifting the way the fund raising and grant dollars are used can solve any difficulty a grantee may be experiencing in this area. In the example above, if fund raising dollars are directed to pay for the 10% portion of project director time spent doing fundraising instead of using grant funds for this 10%, grant funds in the same dollar amount can then be used to purchase items the fund raising money would have purchased for the grant project.

Other non-grant activities are not allowable under ACoA grants. Staff time spent on activities not necessary to provide the services of the grant may not be paid for with grant resources, nor may other grant resources be used for non-grant activities. Staff time spent on non-grant activities must be paid for with

non-grant funds. This includes time spent in such activities as housing development and recreation (unless part of an approved Preventive Health Services Work Plan). Also, grantees may not use grant funds to support activities for religious purposes, either through direct or indirect cost.

Suggested Audit Procedures

- Review job descriptions and interview project director, board members, and project staff to determine whether any material amount of staff time paid for under the grant is spent doing organized fundraising or other non-grant activities, including religious activities. If so, provide guidance to prevent unallowable cost in this area.
- Determine the amount of unallowable cost for any material amount of project staff time spent doing organized fundraising or other non-grant activities.
- Review direct and indirect cost expenditures to determine whether any grant resources were used to further religious purposes and, if any, determine the amount of unallowable costs.

Criminal Background Checks of In-Home Employees

Each employee of an agency providing publicly funded home care services (homemaker, chore, personal care, home health, and similar services), including volunteer staff and Senior Employment Program participants who provide these services, must have a criminal background check done by the Department of Public Safety, pursuant to AS 12.62.035. Each grantee must adhere to this statute and pursuant regulations.

Suggested Audit Procedure

- Review records to verify that each employee performing Homemaker, Chore, and/ or other home care services has had a criminal background check and has no record of criminal behavior relating to children or senior citizens.

Modified 5/00

Senior Community Service Employment Program

Department of Administration – Program 3

I. PROGRAM OBJECTIVES

The Alaska Legislature created the Alaska Commission on Aging (ACoA) in 1981 to ensure dignity and independence for Alaska's elderly and assist them in maintaining meaningful, quality lives. As part of the Division of Senior Services, the ACoA plans, coordinates, and grants funds to provide community-based services to help seniors live as independently as possible. Services include meals, rides, residential care, adult day programs, respite care, care coordination, support to families of dementia clients, legal services, and a variety of other support services. The Division of Senior Services is the State Unit on Aging for the Older Americans Act. Alaska is a single planning and service area state.

A. Accounts Structure

ACoA administration is in the Division's Protection, Community Services, and Administration budget component. The ACoA oversees four grants programs in four other additional budget components:

- The Home and Community- Based Care (HCB) budget component includes grant funds supporting adult day services, respite care, care coordination, and Alzheimer's Disease education and family support. Funding sources include state general funds authorized under AS 47.65 and state general funds allocated from the Alaska Mental Health Trust Authority.
- The Senior Residential Services (SRS) budget component includes grant funds supporting senior residential services. Funding sources include designated state general funds authorized under AS 47.65.
- The Nutrition, Transportation and Support Services (NTS) budget component includes grant funds supporting senior nutrition, transportation, and supportive services. Funding sources include federal Title III B, C, D, and F of the Older Americans Act, U.S. Department of Agriculture cash reimbursement, required state general fund match, and state general funds authorized under AS 47.65.
- The Senior Community Service Employment program (SCSEP) budget component includes grant funds supporting the senior employment programs. Funding sources include federal Title V, required state general fund match, and state general funds authorized under AS 47.65.

B. Program Organization

The ACoA grants separate awards for HCB, SRS, NTS, and SCSEP services. HCB grant awards for adult day services, respite care services, care coordination, and support for families of dementia clients require grantees to implement sliding fee schedules and when possible, bill third party insurance and other third party payer sources. SRS grant awards for senior residential services allow grantees to charge fees for services. In contrast, federal regulations govern NTS grants for meals, rides, and a variety of support services through Title III of the Older Americans Act, and prohibit the assessment of client fees, though allow for the solicitation of voluntary client contributions. The SCSEP is separate because it is a jobs program, rather than a service program such as NTS, HCB, and SRS although SCSEP participants often are placed in the services programs. Separate HCB and SRS grant awards also assure that Alaska Mental Health Trust Authority (MHTA) funds are allocated and tracked. In addition, HCB and SRS services are ACoA's more intensive, higher cost-per-client services.

II. PROGRAM PROCEDURES

See Section III, below.

III. COMPLIANCE REQUIREMENTS AND SUGGESTED AUDIT PROCEDURES

PROGRAM ADMINISTRATION

The SCSEP is authorized under Title V of the Older Americans Act (OAA) of 1965, as amended. The United States Department of Labor's Employment and Training Administration administer the program. (20 CFR Part 641) The SCSEP provides and promotes useful, part-time job and training opportunities in community service activities for low-income persons who are 55 years of age and older and, assists and promotes the transition of program participants to unsubsidized employment.

A. TYPES OF SERVICES ALLOWED OR UNALLOWED

Compliance Requirement

The Alaska Commission on Aging is responsible for following and enforcing the requirements set forth in the OAA and implementing and carrying out projects in accordance with the provisions of the grant agreement. (20 CFR 641.302(a)(1)(2)(3)(b)(c)(d))

The ACoA must assure that the project will serve the needs of minority, limited English-speaking, and Indian eligible individuals as well as eligible

individuals who have the greatest economic need, at least in proportion to their numbers in the State. The SCSEP shall take into consideration their rates of poverty and unemployment based on the best available information.

The ACoA periodically shall monitor the performance of grant-supported activities to assure that project goals are being achieved and that the requirements of the OAA and USDOL are being met.

The ACoA shall obtain and record the personal information necessary for a proper determination of eligibility for each individual and maintain documentation supporting the eligibility of enrollees.

The ACoA shall make efforts to provide equitable services among substantial segments of the population; including outreach to broaden the composition to include members of both sexes, various race/ethnic groups and individuals with disabilities. (20 CFR 641.302)

Suggested Audit Procedures

- There are no special suggested audit procedures.

B. ELIGIBILITY

Compliance Requirements

All eligible individuals must be 55 years of age or older whose income is not more than 125% of the poverty guidelines established by the Bureau of Labor Statistics. Individuals who are 60 years of age or older shall have priority for the work opportunities provided for under this title. A disabled person may be treated as a "family of one" for income eligibility purposes. (20 CFR 641.305)

As set forth in sections 502(b)(1)(M) and 507(1) of the OAA, enrollment priorities for filling all positions shall be according to 20 CFR 641.306(a)(b).

The (SCSEP) or their sub-grantees are responsible for certifying eligibility prior to participation in community service assignment. Re-certification must be completed once a year. (20 CFR 641.305)

The ACoA staff shall review each Intake Application and make the final determination of program eligibility. When a participant has been incorrectly determined eligible, the Commission will notify the grantee and instruct the grantee to give the individual a 30-day notice of termination.

Suggested Audit Procedures

- Verify that the (SCSEP) sub-grantee has documented client age and income and determined eligibility prior to participating in community service assignments.
- Verify that the hardest to serve clients and those over 60 are being given priority for community service assignments.
- Verify that re-certification is completed annually.

ALLOWABLE SERVICES

Compliance Requirements

The SCSEP or sub-grantee shall provide orientation to eligible individuals who are enrolled as soon as practical after determination of eligibility according to 20 CFR 641.308.

The SCSEP or sub-grantee shall assess each enrollee under the grant according to 20 CFR 641.309(a)(b).

The SCSEP or sub-grantee shall use the assessment or reassessment for developing an individual development plan (IDP) according to 20 CFR 641.309(e). The IDP must be reviewed at least once in a 12-month period.

Participants shall be employed in projects or at agencies that provide community services. (20 CFR 641.101) Participants may not be employed in projects involving the construction, operation, or maintenance of any facility used as a place for sectarian religious instruction or worship, and participants may not be assigned work involving construction of highways or work which inures primarily to the benefit of private, profit making organizations.

SCSEP enrollee's community service assignment shall not exceed 1,300 hours during a 12-month period. The 1,300 hours includes paid hours of orientation, training, sick leave, and vacation and hours of enrollment provided by all grantees and sub-grantees. The enrollee shall not be required to participate more than 20 hours during one week; however hours may be extended with the consent of the enrollee. (20 CFR 641.310 (b)(3)).

Funds may be awarded for fewer than 20 hours per week. The reduced hours shall be agreed to by the sub-grantee and the enrollee. (20 CFR 641.310(b)(3))

The SCSEP shall ensure that enrollees receive wages at the highest applicable rate according to 20 CFR 641.311(a)(1)(2)(3) and fringe benefits

according to 20 CFR 641.311(b). Enrollee wages and fringe benefits are paid for community service assignments including orientation and training in preparation for community service assignments. (20 CFR 641.311(a))

The SCSEP or sub-grantee shall provide or arrange for training specific to an enrollee's community service assignment.

The SCSEP shall provide supportive services designed to assist the enrollee in participating in community service assignments and preparing and assisting the enrollee in obtaining unsubsidized employment according to 20 CFR 641.312 (b)(1)(2)(3)(4)(5).

The SCSEP shall ensure that enrollees are offered annual physical examinations. An enrollee may refuse the physical examination through a signed waiver. (20 CFR 641.311(b)(3))

Suggested Audit Procedures

- Determine that SCSEP positions are approved in the most recent grant agreement or Notification of Grant Award (NGA) adjustment (position, job title, hourly wage, and fringe benefits, and number of hours approved to work). (Review current grant award.)
- Determine that the host agency is a community service agency as defined in 20 CFR 641.102.
- Review grantee's procedures for limiting SCSEP participants to working the maximum and minimum hours.
- Check to assure that participant salaries from payroll records are the same as those approved in the grant agreement.
- Verify that host agencies provide SCSEP orientation to all participants to assure participants' understanding of the purpose of the SCSEP (20 CFR Section 641.308)
- Verify that the physical examination has been offered and verification of the exam or refusal is documented.
- Verify that an assessment has been completed for each enrollee.

C. MATCHING, LEVEL OF EFFORT, AND/OR EARMARKING REQUIREMENTS

Compliance Requirements

Generally, the project sponsor must pay for at least 10% of the total cost of the project with cash or an in-kind contribution.

The Commission uses General Funds to match 10% of the total project cost.

Suggested Audit Procedures

- There are no special suggested audit procedures.

The ACoA staff monitors for match. No audit procedures are required relating to ACoA grantees.

Funds are awarded through grants to public or private nonprofit organizations, or divisions of state, federal or local government, or Native tribal organizations, to provide community service assignments for older workers who meet the eligibility requirements for the Title V SCSEP as defined in 20 CFR 641.305.

D. REPORTING REQUIREMENTS

Compliance Requirement

Costs associated with participant work must be accounted for separately from other grantee programs.

Suggested Audit Procedures

- Verify that grantee and sub-grantee accounting systems have cost codes for the SCSEP separate from other grant programs.
- Verify that all expenditures associated with SCSEP participants are recorded and current.
- Verify that SCSEP participants are paid in a timely manner.
- Verify that there are two valid signatures (participant and participant's supervisor) on each time sheet.

E. SPECIAL TESTS AND PROVISIONS

Compliance Requirement

The SCSEP enrollees must not displace current employees, nor impair existing contracts for services. (OAA Title V Sec. 501 (b) (1) (F) (I) (G))

The SCSEP enrollees shall not be permitted to work in a building or surroundings or under conditions that are unsanitary, hazardous, or dangerous to the enrollees' health or safety. (20 CFR 641.310(d))

Suggested Audit Procedures

- Test payroll and personnel records to ascertain whether SCSEP participants were used to supplant work that would otherwise be performed.
- Check grantee plan for participant supervision at the work site.
- Verify that the work area has been inspected by appropriate safety licensing/certifying agencies.

Compliance Requirement

SCSEP wages must be the higher of either the federal or state minimum wage, or the prevailing rate of pay for persons employed in similar public employment.

Suggested Audit Procedures

- Identify which positions SCSEP employees fill.
- Ascertain federal and state minimum wage or agency's prevailing pay scale for filled positions.

OLDER WORKER SPECIALIST PROGRAM

According to 20 CFR, Section 641.312 (b)(1,2,3), SCSEP or their sub-grantees shall provide supportive services designed to assist the enrollee in participating successfully in community service assignment and, where appropriate in obtaining unsubsidized employment. The ACoA has awarded sub-grants to agencies to provide these services in Anchorage, Mat-Su Valley, Fairbanks, and Juneau. The employee who provides the services is called an Older Worker Specialist.

The programs may be totally or partially funded with Title V funds to provide the services to SCSEP eligible individuals. These services may include, but are not limited to the following activities:

- Recruitment and selection of eligible enrollees.
- Assessment of enrollees for participation in community service assignments and evaluation of enrollees for continued participation or transition to unsubsidized employment.
- Development of appropriate community service assignments.
- Development of unsubsidized employment opportunities for enrollees.
- Counseling or instruction to assist the enrollee to participate successfully in community service assignment or to obtain unsubsidized employment.
- Counseling designed to assist the enrollee personally in areas such as health, nutrition, social security benefits, Medicare benefits, and retirement laws.
- Periodic meetings on topics of general interests, including matters related to health, job seeking skills, safety, and consumer affairs.

With the implementation of the Workforce Investment Act, the Older Worker Specialist will provide services in the Alaska One-Stop Centers.

Compliance Requirements

Monthly financial reports are submitted on the same schedule as other Title V funded programs. Budgets for these programs may include personnel costs and administrative costs. Accounting records must be supported by such source documentation as canceled checks, paid bills, payroll records, time and attendance records, contract and sub-grant award documents. Source documentation for administrative costs must be retained at the grantee agency and are not required to be submitted along with financial reports.

Suggested Audit Procedures

- Verify that the Older Worker Specialist's time is spent with SCSEP enrollees and that time spent with non-Title V individuals is paid for from other sources.
- Verify that the Older Worker Specialist's services are provided in the One-Stop Centers.

IMPLEMENTATION OF WORKFORCE INVESTMENT ACT

Compliance Requirements

The United States Department of Labor's Employment and Training Administration has regulations for the Workforce Investment Act; Interim Final Rule. (20 CFR Part 652, et.al.)

The SCSEP is a mandated partner under this act. As a mandated partner, the SCSEP will address issues and coordinate services with workforce development partners including entering Memorandum of Understandings, developing working agreements, and providing services in the Alaska One-Stop Centers. The SCSEP will actively work on committees and boards to develop procedures for providing seamless services to potential SCSEP enrollees.

Suggested Audit Procedures

- Verify that the SCSEP staff is participating in plan development both statewide and on local levels.
- Verify that the SCSEP staff has made efforts to ensure that the program is represented on the local workforce investment boards (LWIB) and local One-Stop Center Advisory Boards.

Modified 7/01

Senior Residential Services Program Department of Administration – Program 4

I. PROGRAM OBJECTIVES

The Alaska Legislature created the Alaska Commission on Aging (ACoA) in 1981 to ensure dignity and independence for Alaska's elderly, and assist them in maintaining meaningful, quality lives. As part of the Division of Senior Services, the ACoA plans, coordinates, and grants funds to provide community-based services to help seniors live as independently as possible. Services include meals, rides, residential care, adult day programs, respite care, care coordination, support to families of dementia clients, legal services, and a variety of other support services. The Division of Senior Services is the State Unit on Aging for the Older Americans Act. Alaska is a single planning and service area state.

A. Accounts Structure.

ACoA administration is in the Division's Protection, Community Services, and Administration budget component. The ACoA oversees four grants programs, in four additional budget components:

- The Home and Community-Based Care (HCB) budget component includes grant funds supporting adult day services, respite care, care coordination, and Alzheimer's Disease education and family support. Funding sources include state general funds authorized under AS 47.65 and state general funds allocated from the Alaska Mental Health Trust Authority.
- The Senior Residential Services (SRS) budget component includes grant funds supporting senior residential services. Funding sources include state general funds authorized under AS 47.65
- The Nutrition, Transportation and Support Services (NTS) budget component includes grant funds supporting senior nutrition, transportation, and supportive service. Funding sources include federal Title III B, C, D, and F of the Older Americans Act, U.S. Department of Agriculture cash reimbursement, required state general fund match, and state general funds authorized under AS 47.65.
- The Senior Community Service Employment Program (SCSEP) budget component includes grant funds supporting the senior employment program. Funding sources include federal Title V, required state general fund match, and state general funds authorized under AS 47.65.

B. Program Organization

The ACoA grants separate awards for HCB, SRS, NTS, and SCSEP services. HCB grant awards for adult day services, respite care services, care coordination, and support for families of dementia clients require grantees to implement sliding fee schedules and when possible, bill third party insurance and other third party payer sources. SRS grant awards for senior residential services allow grantees to charge fees for services. In contrast, federal regulations govern NTS grants for meals, rides, and a variety of support services through Title III of the Older Americans Act, and prohibit the assessment of client fees, though allow for the solicitation of voluntary contributions. The SCSEP is separate because it is a jobs program, rather than a services program such as NTS, HCB, and SRS-- although SCSEP participants often fill staff positions in the services programs. Separate HCB and SRS grant awards also ensure that Alaska Mental Health Trust Authority (MTHA) funds are allocated and tracked. In addition, HCB and SRS services are ACoA's more intensive, higher cost-per-client services.

I. PROGRAM PROCEDURES

See Section III, below.

II. COMPLIANCE REQUIREMENTS AND SUGGESTED AUDIT PROCEDURES

A. TYPES OF SERVICES ALLOWED OR UNALLOWED

Compliance Requirements

Senior Residential Services are a separate component that uses ACoA funds to provide residential living for seniors 60 and over who are unable to live alone but who can maintain themselves in a supervised setting with minimal assistance. ACoA funds two facilities, one in Kotzebue and one in Tanana.

Funds for grants must be spent only to support the above service. Each grantee's service plan is identified in the specific grant application unless modified by grant condition or Approved Concept Approval Request.

The following ACoA grants management policies applicable to SRS grants have been in effect since FY93:

- Grants are awarded based on approved “bottom-line” budgets. Grantees no longer have line item accountability to ACoA within their SRS budgets.
- Grantees must submit a “Concept Approval Request” form if they wish to change their projects in some way that will cause service levels to increase or decrease more than 5% from the planned service levels shown on their Planned Services form or make any other *very major change* from what has been submitted in the grant application. “Very major changes” include

adding or discontinuing a service, opening or closing a site; changing the number or days of service; changing hours of service; serving more or fewer months of the year; shifting large amounts into travel for more than one trip out of state; purchase of equipment; etc.

Suggested Audit Procedures

- Review specific Request for Proposals under which the grant is funded.
- Review the grant application, Special Conditions of Award on the final Notice of Grant Award, and any approved Concept Approval Requests to determine the approved service plan. Occasionally, letters or memoranda in the file may document approved changes in grant activities.
- Determine whether accounting records provide for identification, classification, and recording of expenditures and revenues for senior residential services.
- Verify that expenditures were in accordance with grant terms and conditions and were for allowable costs.

B. ELIGIBILITY

Compliance Requirement

Senior Residential Services (SRS) provides residential care to physically frail or disabled seniors 60 years of age and over (see RFP for other eligibility criteria).

Suggested Audit Procedures

- Test participant eligibility.

C. MATCHING, LEVEL OF EFFORT, AND/OR EARMARKING REQUIREMENTS

Compliance Requirements

All SRS programs must provide required match as described in the RFP. Local match must be comprised of cash or in-kind items necessary to provide the services of the grant. In-kind match items must be items for which ACoA grant dollars could be used if they were available. Rent receipts and program income may be used as match for SRS programs. For a complete discussion of local match, refer to the Cost Proposal Instructions in the RFP under which the grant is funded.

The required local match percentage varies for each community or group of communities from year to year. The amount of local match required is specified on the final Notice of Grant Award.

Suggested Audit Procedures

- Review final notice of Grant Award to identify the required level of local match.

- Review grant application and any approved Concept Approval Requests to identify the approved sources of local match.
- Review the agency's accounting records to determine whether local match has been contributed to the project according to the terms and conditions of the grant.

D. REPORTING REQUIREMENTS

Compliance Requirements - Program Reports

Quarterly Program Reports are due in the Alaska Commission on Aging Juneau office by the 15th of the month following the end of the quarter.

Provisions for late reports are discussed in the instructions for the report.

Reports must show all of the required information for each service provided or client group served under the grant.

Suggested Audit Procedures

- Review the SRS Quarterly Program Report Instructions for the grant year being audited.
- Evaluate the timeliness of report submission
- Evaluate the completeness of the reports based on approved grant service activities.
- Evaluate the accuracy of the reports by tracing and linking data on the reports to supporting documentation.

Compliance Requirements - Fiscal Reports

Cumulative Fiscal Reports are due in the Alaska Commission on Aging Juneau office by the 15th of the month following each quarter. If the fourth quarter's report is not marked "Final," a final Cumulative Fiscal Report is due in the ACoA Juneau office by July 30. Provisions for late reports are discussed in the instructions for the report. Reports are to accurately reflect the financial transactions of the grant as specified in the instructions for the report.

Suggested Audit Procedures

- Review the Cumulative Fiscal Report Instructions for the grant year being audited.
- Evaluate the timeliness of report submission;
- Evaluate the completeness of the reports based on approved grant service activities.
- Evaluate the accuracy of the reports by tracing and linking data on the reports to supporting documentation.

E. SPECIAL TESTS AND PROVISIONS

1. Program Income SRS programs may solicit program income from clients; however, fees for services may usurp program income from clients.

Programs must account for program income from clients and spend those funds to enhance or expand the SRS program. Program income must be expended during the quarter in which it is received. Requests to carry over program income into the next fiscal year must be approved by ACoA. Program income must be expended before ACoA grant funds, unless ACoA has specifically approved other arrangements.

2. Rent SRS programs must charge clients rent based on a percentage of the resident's income or as established by the facility. Tanana Elders Residence charges rent based on a percentage of each client's monthly income. Kotzebue Senior Citizens Cultural Center charges a fixed rent.
3. Rent should be treated as match or program income. It does not need to meet federal definitions because it is not a federally funded program.
4. Program Income Not From Clients SRS programs potentially will receive and report interest on bank accounts, rent from the grant portion of the building space, or other sources of program income not from clients.
5. Other Sources Medicaid Waiver receipts used to support the grant should be classified as "Other Sources."
6. Handling Client Personal Cash Residential facilities personnel generally handle the personal cash of residents who are unable to do so for themselves. A method to account for client personal cash, paying interest to clients based on their bank deposits, tracking client expenses, etc., should be established and followed by each facility.
7. Criminal Background Checks of In-Home Employees Each employee of an agency providing publicly funded home care services (homemaker, chore, personal care, home health, and similar services), including volunteer staff and Senior Employment Program participants who provide these services, must have a criminal background check done by the Department of Public Safety, pursuant to AS 12.62.035. Senior Residential Services grantee facilities are classified as "assisted living facilities," which provide home care. As such, their employees are required to have criminal background checks. Each grantee must adhere to this statute and pursuant regulations.

Suggested Audit Procedures

- Review the grant application (and Notice of Grant Award for possible modifications) to determine the source of program income, whether it was to be solicited from clients, and to determine whether rent and program income were to be used as match.
- Evaluate the solicitation, collection, handling, accounting for, and use of rent and program income.
- Review procedures for handling residents' personal cash. Verify that methods used by facilities to handle client personal cash are in place and accurately track clients' funds, personal expenses, and interest earned.

- Review documentation of receipt and expenditure of Medicaid Waiver revenue to determine whether it is classified as “Other Sources” when dedicated to SRS grant services.
- Review records to verify that each employee performing home care services has had a criminal background check and has no record of criminal behavior relating to children or senior citizens.

Modified 5/00

Alaska Public Broadcasting Commission Grants

Department of Administration – Program 5

I. PROGRAM OBJECTIVES

The primary objective of the Alaska Public Broadcasting Commission's Operating and Capital Grants Program is the encouragement and support of non-commercial public broadcasting in Alaska. This objective is accomplished through the award of operating and capital grants in support of the delivery of noncommercial programs intended for a general audience by locally controlled non-profit broadcast stations or telecommunications entities.

II. PROGRAM PROCEDURES

The staff of the Commission prepares application forms for both capital and operating grants to be distributed to stations on an annual basis. The staff then evaluates station requests for capital and operating grants and makes recommendations for Commission action on each application. The grants are awarded by the Commission. Staff then monitors expenditures of all grantees to assure that funds are used as agreed.

III. COMPLIANCE REQUIREMENTS AND SUGGESTED AUDIT PROCEDURES

A. TYPES OF SERVICES ALLOWED AND UNALLOWED

Compliance Requirement

The Commission makes grants of funds and property to non-profit corporations, which use the funds or property to establish and operate public broadcasting stations.

Suggested Audit Procedure

- Test expenditures to determine that funds were used for establishment or operation of a public broadcast station.

B. ELIGIBILITY

Compliance Requirement

The corporation is qualified to receive funds and properties from the Commission, to establish and operate public broadcasting facilities in this state, if the corporation is organized as a non-profit organization under AS 10.20 and is qualified as tax exempt by the United States Internal Revenue Service.

Suggested Audit Procedure

- The auditor is not expected to verify eligibility.

C. MATCHING, LEVEL OF EFFORT, AND/OR EARMARKING REQUIREMENTS

There are no matching or level of effort requirements.

Local fund raising efforts are encouraged and all station budgets will typically identify any leveraged funds.

D. REPORTING REQUIREMENTS

Compliance Requirement

Qualified corporations are required to submit monthly and/or quarterly progress reports as specified in the Entitlement Agreement.

Suggested Audit Procedures

- Examine copies of reports to determine completeness and timeliness of submission; and
- Trace data in selected reports to underlying documentation.

Compliance Requirement

Operating and capital funds are to be accounted for separately.

Suggested Audit Procedure

- Determine that the grantee has provided separate accounting.

E. SPECIAL TESTS AND PROVISIONS

Compliance Requirement

Grantees are required to adhere to certain regulations of the FCC.

Modified 1/86